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1. Commitment to respect human rights and environmental standards

Nowadays, responsibility is becoming an increasingly important component that we as Clarios are also facing up to and our corporate responsibility, particularly with regard to respecting human rights and environmental rights. The employees within the company act in accordance with legal regulations and further internal guidelines. But our responsibility does not stop here. The Clarios Group's responsibility also extends to our global supply chain and we actively work to ensure compliance with human and environmental rights. In order to be able to implement this undertaking, all suppliers, both new and existing, are subject to our "Code of Conduct". In this document, suppliers and business partners undertake to comply with our standards and to enforce them against their own suppliers and business partners. Through preventive and remedial measures, we give those affected the opportunity to improve their current situation. Through internal guidelines, we fulfill both the legal provisions relating to human rights and environmental obligations that are part of our corporate responsibility. With this declaration of principles, we as Clarios Group commit ourselves to compliance with international standards. These include:

- The Ten Principles of the UN Global Compact
- The International Bill of Human Rights
- The UN Guiding Principles on Business and Human Rights
- The International Labor Organization's Declaration on Fundamental Principles and Rights at Work of the ILO
- The ILO Declaration of Principles concerning Multinational Enterprises and Social Policy
- The Guidelines for Multinational Enterprises Organization for Economic Cooperation and Development

2. How we influence human and environmental risks

In order to avoid human rights violations, we as Clarios Group analyze our supply chain for potential human rights and / or environmental risks within the risk analysis process. By analyzing our own business as well as the global supply chain, we want to proactively prevent risks and create preventive measures to reduce and, if possible, eliminate these risks. Clarios has influence not only on its own employees, but also on the upstream and downstream supply chain, so we require our suppliers and business partners to remove risks that have arisen in their respective fields of activity or to create concrete remedial measures. The Clarios Group is also aware that a one-off analysis is not sufficient to protect human and environmental rights, so the risk assessment is regularly updated and the preventive and remedial measures are reviewed for their functionality.

a. Prohibition of child labor

Children need special protection. Their health and safety are very important and their development must not be restricted as a result of gainful employment. The Clarios Group prohibits child labor and adheres to the minimum age for employees set by the ILO. Child labor is fundamentally rejected, especially the worst types of child labor, where children and adolescents under the age of 18 are forced to work through slavery, immorality or danger.

- b. Prohibition of forced labor
The Clarios Group does not tolerate any form of forced or compulsory unlawful labor, modern slavery, human trafficking, facilitation of trafficking, threats, coercion, coercion and abduction. This promise applies to us as a Group as well as to our suppliers and business partners. The work of all employees must be voluntary, so we review our employment contracts in this respect and all employees have the right to terminate them in accordance with the statutory provisions.
- c. Freedom of association and the right to collective bargaining
Our employees have the right to organize themselves voluntarily and to conduct collective bargaining in accordance with statutory regulations. We provide employee representatives with the necessary access to carry out their tasks and stand for open communication so that employees and management can reach mutually agreeable solutions. Furthermore, a trusting and constructive cooperation with the employee representatives is important to us in order to achieve the best possible result for the employees. Every employee who gets involved is in no way favored or disadvantaged because of this willingness, instead we encourage regular exchange.
- d. Right to diversity / prohibition of discrimination & harassment
In the culture of diversity, the principle of equal treatment is becoming an increasingly important asset and is the cornerstone of work at the Clarios Group. Discrimination and unequal treatment are not tolerated and we are committed to this throughout the entire supply chain. Cultural diversity and mutual respect is our approach, so that characteristics such as gender, skin color, religion, nationality, political or other beliefs, ethnic origin, disability, age, sexual orientation or other characteristics are no reason to treat people differently. We support the free development of our employees and their personalities so that a working atmosphere is created that is creative, friendly and productive.
- e. Right to health & safety at work
An employee's workplace is their daily point of contact, so we ensure that they are protected from physical or psychological harassment and abuse. Physical integrity is a valuable asset and cannot do without adequate protection. Through regular inspections, we detect potential weak points in good time and eliminate them. We ensure the safety of our employees with the help of personal protective equipment and regular training. Our plants within Europe are ISO 45001 certified. We also ensure that our employees do not experience any form of harassment in the workplace. This also includes respecting and promoting the health and safety of our employees. To this end, we strive for the well-being of employees and employees in the supply chain and that they are protected by every form of occupational health and safety. We act proactively against accidents at work and occupational illnesses.
- f. Right to fair pay & working hours
Every employee has the right to appropriate remuneration for work performed, and we comply with all applicable wage laws, regulations and collective agreements. Through global remuneration principles, we have created the basis for appropriate remuneration that is adapted to the respective local conditions, such as minimum standards or the minimum wage, and adhered to. Wages are paid punctually and in full to employees in their local currency, as are reimbursed expenses. The importance of working hours in terms of work-life balance is becoming increasingly

important, so that we as the Clarios Group take into account both operational concerns and the individual needs of our employees. The ILO core labor standards form the basis for this and are adapted and expanded according to the applicable regulations in each country. If the "normal" working hours are not sufficient and the employees work overtime, compensation options have been created, which are paid to the employees either in the form of time off or in the form of appropriate remuneration.

g. Right to local communities and indigenous peoples

In the Clarios Group's business activities, we respect the rights and health of local communities and indigenous peoples, as we are against the destruction of cultural and spiritual places. We also reject forced evictions or land confiscation, so we pay particular attention to risky scenarios such as air, water or soil pollution. Other scenarios that we as a company do not turn a blind eye to are deforestation, the handling of hazardous substances and their disposal, as well as the extraction of water in regions where water scarcity is an acute problem. With this in mind, we pay attention to where we locate, expand or relocate our sites so that local communities and indigenous peoples experience as few restrictions as possible, if these cannot be completely avoided. At the sites themselves, our processes are environmentally friendly and resource-oriented in order to avoid negative impacts.

h. Protection of the environment / Handling of risky raw materials

Environmental protection and the sustainability of our own products is our responsibility as a commercial enterprise. It is embedded in our business strategies and our way of doing business. Clarios has set itself ambitious measurable sustainability targets that are in line with the United Nations' (UN) Sustainable Development Goals for 2030 (SDGs) and the Climate Goals of the Paris Agreement. Through technologies that are environmentally friendly, advanced and efficient, we do our best to extend the cycle of our batteries. By producing our power frame grids, we release 20% less greenhouse gases than conventional methods. Once the end of such a cycle has been reached, our batteries can be dismantled at our own recycling sites so that the raw materials can become part of new batteries. Chemicals and other substances that pose a risk to the environment must be identified. In the manufacture of our products, the handling of risky raw materials cannot be avoided, but we place a high priority on the protection of our employees and regular inspections so that measures can be taken at an early stage to reduce the risk to the employees concerned. We have also developed the EMEA Supplier CSR Survey, which is a further development of the Clarios Sustainability Survey. In this survey, our suppliers are asked about human rights, occupational health and safety. The EMEA Supplier CSR Survey highlights these aspects against the backdrop of the high risks posed by certain materials or metals (e.g. lead). Particular emphasis is placed on the use and development of energy-saving, water-saving and water-cleaning technologies, as well as the use of air pollution control, emission reduction, energy conservation, greenhouse gas reduction, reuse and recycling strategies.

i. Protection of personal data

Clarios recognizes its responsibility to safeguard our employees' data as well as other personal data, and we follow applicable data and privacy laws. Based on our Privacy Policy, we process personal data for specific purposes to support our operations and provide employee benefits. We inform individuals about the

collection and processing of their personal data and their rights with respect to their personal data, as required by applicable data and privacy laws. Further information on our data processing activities can be found in our Employee Privacy Notice, Records Retention Policy, Privacy Guidance on Employee Communication, and our Privacy Impact Assessment and Data Mapping Procedure. Approach to the implementation of due diligence obligations.

3. Approach to the implementation of due diligence obligations

The due diligence obligations are not completed with a one-off review of the processes; they require regular review to determine whether the implementation has achieved the desired objectives and reduced the human rights and environmental risks. A further aspect that plays a role in the audit is the findings and approaches that are developed through information and the processing of complaints, so that we are constantly developing our processes further. When implementing processes and measures, we always comply with legal requirements and national law. In order to gain an overview of the effects of our actions and our responsibility, we examine the potential and actual impact of measures on people and the environment. Through risk management, we analyze relevant risks and possible groups of people affected by our actions, as well as indirect actions through business relationships. Our Human Rights Officer is responsible for monitoring risk management and compliance with due diligence obligations within the supply chain. Furthermore, the Human Rights Officer reports regularly to the management to establish possible (preventive) measures so that the control function is ensured with regard to the introduction of suitable preventive and corrective measures, including the monitoring of procurement and purchasing strategies and the implementation of training. Furthermore, the SCDDA Project Committee and Clarios EMEA RCC oversee and regularly review the implementation of the law, enabling us to integrate and implement changes into existing processes as quickly as possible.

4. Groups of persons involved

The aim of the Supply Chain Duty of Care Act is to ensure that the entire supply chain is monitored, so that the scope of application applies not only to our own business area, including all Group companies and our employees, but also to our business partners and suppliers. The employees of the Clarios Group have adopted respect for human rights as a high value through our corporate culture and our understanding of values and have integrated it into their everyday lives. Furthermore, they have committed themselves through our Code of Conduct to align their professional actions with these values. The Code of Conduct contains our principles and allows us to take action if critical or risky situations and aspects become known. By affirming respect for human rights, we also uphold the core labor standards of the ILO, so that worldwide compliance with the Code upholds the rights and principles.

a. Suppliers and business partners

Our suppliers and business partners are also bound by our Code of Conduct, as it forms the basis of our business relationship. In addition to the Code of Conduct, our General Terms and Conditions and the Terms and Conditions of Purchase that Clarios has drawn up also apply. On the basis of these guidelines and specifications, our suppliers and business partners declare their commitment to their social responsibility so that the conditions for cooperation are met. Through this commitment, they agree to communicate the principles to their suppliers and to agree their own principles with them, which are in line with Clarios' principles.

b. Groups of persons affected / potentially at risk

Employees are the group of people who are affected or potentially at risk in most cases. These can be the Clarios Group's own employees, as well as employees in training or who are employed by Clarios through a temporary employment agency. Also potentially affected or at risk are employees of business partners, joint ventures, direct or indirect suppliers, as well as persons indirectly involved in the supply chain. Within the potentially vulnerable groups, we try to give those persons who are exposed to a higher risk a special status. Above all, people who defend human rights are the focus of hostility, threats and criminal activities. To prevent this, we seek exchange in order to improve cooperation and ensure protection.

5. Risk management & risk analysis

Our suppliers undergo a risk assessment at least once a year, which is divided into three areas. The commodity risk, the country risk and the supplier risk; the individual results are used to produce an overall assessment of the risk for a supplier. The commodity risk is determined using the CRS risk check of the Agency for Economic and Development Affairs. The individual raw materials are classified according to risks such as the probability of damage or the scope of the business activity. The materials examined include lead, resins, packaging materials and sulphuric acid. The Amfori country risk classification list and the EPI environmental performance index are used to determine the country risk. Both the supplier's production sites and its headquarters are taken into account here. The supplier risk is determined on the basis of the latest Clarios sustainability survey. As soon as the risk analyses of the three areas have been prepared, an overall assessment of each supplier is created. The four areas are then reviewed on the basis of threshold values and the critical suppliers are identified. For these suppliers, the recorded risks are checked and an attempt is made to clarify them, as the supplier may already have taken remedial action. If this is not the case, an on-site assessment can be carried out based on the CSR-relevant criteria. The supplier goes through the escalation matrix which is described in the CRS policy for the supplier chain.

6. Remediation

If Clarios determines that its business activities contribute to potential or actual human rights violations or are indirectly linked to such violations, Clarios strives to obtain appropriate remedial action from the responsible parties. For this purpose, internal processes are being further developed to determine how to proceed when violations are

discovered and how to define appropriate remedial and compensation measures in its own business area and with direct and indirect suppliers.

If Clarios has a reasonable suspicion or concrete evidence of possible of possible human rights violations in its own operations, it will take immediate action to end the violation or risk. If human rights or environmental rights have been violated by a business partner, Clarios will define measures ranging from the elimination of the behavior that caused the violation, to preventive measures through training and audits, to working towards appropriate remedial measures, which must be implemented by the supplier as a prerequisite for further cooperation with Clarios. Clarios reserves the right to contractually require its business partners to assist in the investigation and to cooperate fully within a reasonable timeframe. Depending on the severity of the violation, Clarios will take appropriate action, ranging from a request for immediate corrective action to legal action and termination of the relationship.

7. Effectiveness control

The revision of the CSR relevant data in the Supplier Risk Assessment should be conducted regularly as per fixed revision-rota, at least yearly.

8. Complaint management

Internal and external persons can submit reports or complaints via our Integrity HelpLine. The identity of the person making the report remains anonymous, unless the person decides to make the report openly. In both cases, the information is checked by our Compliance department employees and investigated to determine the extent to which there is a suspicion of a possible or actual violation of human rights and the associated environmental rights. The information can be used to identify potential risks at an early stage so that opportunities can be created to prevent them before an actual violation occurs. We would therefore like to express our thanks for every report of a potential or actual violation. Our Human Rights Officer receives a monthly report on the complaints received and the current status of the complaints so that measures can be taken to remedy the situation.

9. Reporting

We submit an annual report to the Federal Office of Economics and Export Control (BAFA) to report on our due diligence processes and their effectiveness in the supply chain and to inform the public about our human rights and environmental obligations.